

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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***RESPONSE OF GE FANUC AUTOMATION NORTH AMERICA, INC. TO:
DEBTORS' NINETEENTH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO
11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) INSUFFICIENTLY
DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS
AND RECORDS, (C) UNTIMELY CLAIM, AND (D) CLAIMS SUBJECT TO
MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION, MODIFIED
CLAIMS ASSERTING RECLAMATION, AND CONSENSUALLY MODIFIED AND
REDUCED CLAIMS***

GE Fanuc Automation North America, Inc. ("GE Fanuc") responds to the Debtors' Nineteenth Omnibus Claims Objection as follows:

1. GE Fanuc filed a timely proof of claim in the amount of \$6,837.48 for services rendered to one of the Debtors prepetition. Copies of the relevant invoices were attached to GE Fanuc's proof of claim.
2. The Debtors have objected to GE Fanuc's proof of claim in the Nineteenth Omnibus Claims Objection. The sole basis recited in the Notice of Objection to Claim served on GE Fanuc is "Books and Records Claims." The Debtors' Nineteenth Omnibus Claims Objection explains that this means that the Debtors' books and records do not reflect the existence of GE Fanuc's claim or that the claim has been paid, among other possibilities that are not relevant.
3. GE Fanuc attached the unpaid invoices to its filed proof of claim, and has now researched the possibility that these items were paid by the Debtors. However, they have not

been paid and remain outstanding, undisputed and due pursuant to the terms between the parties. They are for services rendered by GE Fanuc to one of the Debtors pursuant to a contract between the parties, and the services were rendered in accordance with the contract's terms.

4. The proof of claim establishes a prima facie case for the claim, and unless the Debtors produce some specific evidence in contravention of the filed claim, the proof of claim should be allowed.

5. If the Debtors wish to respond or inquire further, they should do so to the undersigned, at the phone number, fax, email or address shown on the signature block.

WHEREFORE, GE Fanuc Automation North America, Inc. requests that the objection be overruled and that its claim be allowed in full.

GE Fanuc Automation North America, Inc.

By: /s/ Michael R. Enright
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